

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

NADINE JOHNSON,
6434 N. 15th Street
Philadelphia, PA 19126

Plaintiff,

vs.

NCO FINANCIAL SYSTEMS, INC., :
507 Prudential Road :
Horsham, PA 19044 :

Defendant.

CIVIL ACTION

No. 02-CV-4165

OFFER OF JUDGMENT

Defendant, NCO Financial Systems, Inc., by and through its counsel,
Marshall, Dennehey, Warner, Coleman and Goggin, pursuant to Federal Rule of
Civil Procedure 68 serves this Offer of Judgment on Plaintiff, Nadine Johnson.

1. This Proposal for Settlement is being made on behalf of Defendant,
NCO Financial Systems, Inc.

2. The claims this Proposal for Settlement attempts to resolve are all claims asserted by the Plaintiff against Defendants for alleged violations of the Fair Debt Collection Practices Act, 15 U.S.C. §1692e(5), and 1692f(2), as specified in the Complaint.

3. The relevant conditions of this Offer of Judgment are that:

a. Payment to the Plaintiff, Nadine Johnson, of the amount offered herein shall be made in a lump sum; and

- b. This Offer of Judgment may be accepted in whole and may not be accepted in part, subject to the approval of the Court.

4. The Defendant NCO offers to pay Plaintiff, Nadine Johnson, the following:

- a. **\$1,000.00** (ONE THOUSAND dollars and 00/100) for alleged violations of the Fair Debt Collection Practices Act, 15, U.S.C. §1692, *et seq.*;
- b. **\$500.00** (FIVE HUNDRED dollars and 00/100) in additional compensation for all reasonable attorney's fees and costs incurred in pursuing this action.

5. This Proposal for Settlement may be accepted, rejected, or withdrawn as applicable law provides.

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**

BUTLER BUCHANAN, ESQUIRE
ANDREW M. SCHWARTZ, ESQUIRE
Attorneys for Defendant,
NCO Financial Systems, Inc.

1845 Walnut Street
Philadelphia, PA 19103
215-575-2661/2765

Date: **August 29, 2002**

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the ***OFFER OF JUDGMENT*** of Defendant, NCO Financial Systems, Inc., to Plaintiff, Nadine Johnson, was served via regular, first class mail on August 19, 2002.

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**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**

By: BUTLER BUCHANAN, ESQUIRE
ANDREW M. SCHWARTZ, ESQUIRE
Attorneys for Defendant,
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